

EXHIBIT 1

Julie A. Guthrie, M.D.

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO

- - -

Kathryn Kiker, Individually :
and as Natural Parent and :
Guardian of C.S., a Minor, :

Plaintiff, :

VS. :

CASE NO.

2:14-cv-02164-EAS-TPK

SmithKline Beecham :
Corporation d/b/a :
GlaxoSmithKline LLC, :

Defendant. :

- - -

VIDEOTAPED DEPOSITION OF JULIE A. GUTHRIE, M.D.

- - -

Monday, August 10, 2015

9:00 a.m.

5025 Arlington Centre Blvd.

Columbus, Ohio 43220

- - -

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Julie A. Guthrie, M.D.

1 DEPOSITION OF JULIE A. GUTHRIE, M.D.

2 APPEARANCES

3 - - -

4 R. Jason Richards, Esquire
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Appearing on behalf of the Plaintiff.

8

Geoffrey M. Drake, Esquire
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12 Appearing on behalf of the Defendant.

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14 ALSO PRESENT:

15 Pat Flaherty, PM Productions, Videographer.

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1 MR. DRAKE: Okay. Thank you very
2 much.

3 By Mr. Richards:

4 Q Were you aware that sales
5 representatives made call notes after they visited
6 you?

7 A I don't know specifically what call
8 notes are.

9 Q They're just contact information. So
10 they're contact information. They come, they give
11 you samples, they talk to you about a drug, and then
12 they go --

13 A Yes, I think I knew that.

14 Q -- type it in.

15 A I don't know what they write, but I
16 assume there's some documentation of that contact.

17 Q And this looks like the first contact
18 that we were given, Event Date was January 21st,
19 1998. Do you see that?

20 A Okay.

21 Q From a sales rep named Bonnie
22 Coley-Malir. Do you see that?

23 A Yes.

24 Q Do you know who that is? Do you
25 remember her?

Julie A. Guthrie, M.D.

1 A No.

2 Q It looks like that she on January 21,
3 1998 gave you samples of Paxil. Would that -- it
4 looks like ten, sample quantity ten. Is that
5 something that would typically happen, a sales
6 representative would come in and give you samples of
7 Paxil?

8 A Yeah, that would typically happen.

9 Q They would -- as you understand it, a
10 sales representative's job is to sell --

11 A Indeed.

12 Q -- their product?

13 A Uh-huh.

14 Q And it continues on from 1998 on down
15 into 1999. The sales representatives sometimes
16 change, it looks like. So as of January 22nd, 1999,
17 this is before you prescribed it to Kathy Seecamp,
18 you had sales representative names: Stacy Archer, do
19 you remember her?

20 A No.

21 Q And it looks like sample quantity of
22 Paxil was one. Even before that, September 28th,
23 1998, it looks like Stacy Archer left you 30 samples
24 of Paxil. Is that 30 individual boxes?

25 A I don't know.

1 Q So you continue on. January, February,
2 June, July, October, November, December of 1999. It
3 looks like at the bottom it kind of goes out of
4 order. At the very bottom of the page it says:
5 February 2nd, 1993. Do you see that?

6 A I see that.

7 Q Sales representative named Michelle
8 Feeman. Do you remember her?

9 A No. I can tell you that that date is
10 incorrect because we were not at that address in
11 1993. So that's an error in dating.

12 Q It's either an error in dating or
13 they -- is it possible that they updated the system
14 once you changed and just kept the old contact notes
15 in here?

16 A I couldn't say.

17 Q You're not sure how they keep there
18 contact logs, are you, GSK?

19 A (Witness shakes head.)

20 Q So if we look at the prescription
21 history that we have from you from May through
22 November of 2000 and look at the call notes, it looks
23 like that representatives from GlaxoSmithKline were
24 calling on you during that entire time frame, right?

25 A It appears so.

1 Q -- that particular association?

2 Are you familiar with any literature
3 reflecting a potential association between birth
4 defects and other antidepressant medication, that is,
5 antidepressants other than Paxil?

6 A No. At this point if I have -- if it
7 becomes relevant to a patient, I look it up as I go.

8 Q Let me ask you a couple questions, if I
9 could, about, and then I'll be done, this will be
10 real quick, about marketing and the discussions that
11 counsel asked you about in terms of sales
12 representatives, okay?

13 A Right.

14 Q Do you have any specific recollection,
15 just so that I'm clear, of any conversations with any
16 GSK sales representative about Paxil at any point in
17 time?

18 A I don't.

19 Q Did any GSK sales -- do you have any
20 recollection of any GSK sales representative ever
21 telling you that Paxil was safe to take during
22 pregnancy?

23 A I don't recall being told that.

24 Q Or that Paxil was safer to take during
25 pregnancy --

Julie A. Guthrie, M.D.

1 A I don't recall being told that --

2 Q -- than other medication?

3 A -- no.

4 Q There was some discussion about --
5 strike that.

6 Has any GSK representative ever offered
7 you a pen or a dinner or anything like that as a quid
8 pro quo in exchange for writing prescriptions of
9 Paxil?

10 A No.

11 Q And when you wrote prescriptions for
12 Paxil for your patients over the years, you did so
13 based on your own judgment and medical acumen, not
14 something a sales representative told you?

15 A That is correct.

16 Q Have you ever found any of the GSK sales
17 representatives that you might have met with over the
18 years to be anything but courteous, knowledgeable,
19 and respectful?

20 A I have no specific recollections of GSK
21 representatives at all.

22 Q Okay. Have you ever attended any events
23 or speaker programs or CME's at which the topic of
24 Paxil and the use during pregnancy was discussed?

25 A I do not recall.